

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

RAYMOND REID COLLINS JR.,

Defendant.

State of New York

County of New York

Southern District of New York

)

) ss.

)



Rushmi Bhaskaran, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Geoffrey S. Berman, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. §3161(h)(7)(A).

2. The defendant was charged in a complaint dated July 15, 2019 with violations of Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2), and 2 (possession of child pornography). The defendant surrendered to authorities on July 16, 2019 and was presented that day before Magistrate Judge Kevin Nathaniel Fox. The defendant was represented by Edward Bilinkas, Esq., and ordered released on a \$300,000 personal recognizance bond with two co-signors, in addition to other bail conditions.

3. At the initial presentment on July 16, 2019, defense counsel consented to a waiver of his client's right, pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure, to a preliminary

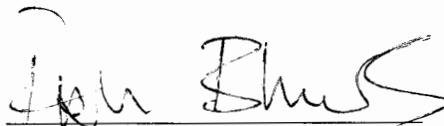
hearing within 21 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until August 15, 2019 within which to file an indictment or information.

4. Defense counsel and I have had discussions regarding a possible disposition of this case beginning on August 12, 2019. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under the Speedy Trial Act expires on August 15, 2019.

5. Therefore, the Government is requesting 30-day continuance until September 16, 2019, to continue the foregoing discussions and reach a disposition of this matter. On August 12, 2019, I personally spoke to defense counsel who specifically consented to this request.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
August 13, 2019

A handwritten signature in black ink, appearing to read 'Rushmi Bhaskaran', is written over a horizontal line.

Rushmi Bhaskaran
Assistant United States Attorney
212-637-2439